IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

JOHN DOE,

: CIVIL ACTION

Plaintiff, : NO. 20-CV-4532

: NOTICE OF UNOPPOSED

: EMERGENCY MOTION TO FILE PRINCETON UNIVERSITY, : DOCUMENTS UNDER SEAL

: PURSUANT TO LOCAL R. CIV. P.

Defendant. : **5.3**(**c**)

To: Clerk of the Court

Daniel J. Fetterman Christian T. Becker Fria R. Kermani 1633 Broadway New York, New York 10019

v.

Tel: (212) 506-1700 Fax: (212) 506-1800

Fax: (212) 506-1800 Attorneys for Plaintiff

PLEASE TAKE NOTICE, that as soon as counsel may be heard, the undersigned, on behalf of Defendant Princeton University, shall appear and move before the Honorable Tonianne J. Bongiovanni, U.S.M.J. in the United States District Court for the District of New Jersey, Trenton Division, located in the Clarkson S. Fisher Building & U.S. Courthouse, 402 East State Street, Trenton, New Jersey, for an order, pursuant to Local Civ. R. 5.3(c), sealing Plaintiff's Complaint and Memorandum of Law in Support of Plaintiff John Doe's Motion for a Temporary Restraining Order and Injunctive Relief (the "documents"). The documents disclose identifying and sensitive student information, including information whose confidentiality is recognized by federal law. While it is imperative to the protection of highly sensitive personal information of non-parties that the unredacted versions of these documents be sealed, redacted

versions will be filed on the public docket. The University will meet and confer with Plaintiff, and propose to the Court redacted versions of the documents, together with any disagreements

about proposed redactions, within one week.

Plaintiff Doe does not oppose this motion.

PLEASE TAKE FURTHER NOTICE that at the aforesaid time and place, in

support of its Motion, Defendant will rely upon the Certification of Stephen J. Kastenberg and

Statement That No Brief Is Necessary, served and filed herewith. It is respectfully requested that

the Court rule upon the moving papers submitted, without requiring appearance of counsel,

pursuant to Fed. R. Civ. P. 78.

A proposed form of order is attached hereto.

Dated: April 16, 2020

/s/Stephen J. Kastenberg

Stephen J. Kastenberg, Esq. (026001993) Christopher J. Kelly, Esq. (024972008)

BALLARD SPAHR LLP

210 Lake Drive East, Suite 200

Cherry Hill, New Jersey 08002-1163 Telephone: 856.761.3400

Facsimile: 856.761.1020

1735 Market Street

Philadelphia PA 19103

Kastenberg@ballardspahr.com (cell 215.913.0350)

Kelly<u>C@ballardspahr.com</u> (cell 267.769.9224)

Attorneys for Princeton University